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CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY ____ DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA,	)	Criminal Case No. '08 CR 1361 DMS
Plaintiff,	)	I N D I C T M E N T
v.	)	Title 8, U.S.C., Secs. 1324(a)(1)(A)(ii) and (v)(II) - Transportation of Illegal Aliens and Aiding and Abetting; Title 8, U.S.C., Secs. 1326(a) and (b) - Deported Alien Found in the United States
RICARDO AVALOS-RAMIREZ,	)	
Defendant.	)	

The grand jury charges:

Count 1

On or about February 18, 2008, within the Southern District of California, defendant RICARDO AVALOS-RAMIREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Arminda Avalos-Ramirez, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 2

On or about February 18, 2008, within the Southern District of California, defendant RICARDO AVALOS-RAMIREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Yaritza Gutierrez-Sotelo, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 3

On or about February 18, 2008, within the Southern District of California, defendant RICARDO AVALOS-RAMIREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Ricarda Cruz-Jimenez, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 4

On or about February 18, 2008, within the Southern District of California, defendant RICARDO AVALOS-RAMIREZ, an alien, who previously had been excluded, deported and removed from the United States to Mexico, was found in the United States, without the Attorney General of the United States or his designated successor, the Secretary of the Department of Homeland Security (Title 6, United States Code, Sections 202(3) and (4), and 557), having expressly consented to the defendant's reapplication for admission into the United States; in violation of Title 8, United States Code, Sections 1326(a) and (b).

It is further alleged that defendant RICARDO AVALOS-RAMIREZ, was removed from the United States subsequent to March 13, 1994.

DATED: April 30, 2008.

A TRUE BILL:

Foreperson

KAREN P. HEWITT
United States Attorney

By:
CALEB E. MASON
Assistant U.S. Attorney